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IRRC Chairman Arthur Coccodrilli
333 Market Street, 14th Floor
Harrisburg, PA 17101

October 23, 2009

Dear IRRC Chairman Coccodrilli,

I am very concerned about the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that there are vague parts of this proposed legislation that may lead to misinterpretation. This misinterpretation can lead to currently well maintained kennels to falsely accused of illegal actions. Please note the following specific examples.

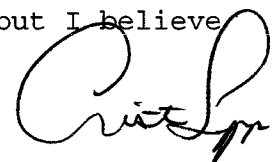
One of my concerns is contained in Section 28a.2 which calls for mechanical ventilation to be implemented if the temperatures are above 85 degrees. The reality is that newborn puppies cannot maintain their own body temperatures until after 10 to 14 days of age. Supplemental radiant heat or infra red heat lamps are routinely used to create an average air temperature between 90 or 96 degrees Fahrenheit in the whelping area. This provides the best safety, health, and well-being of the young litter of puppies and is essential for their viability and survival. This mandate would create a separate violation for each puppy and mother and for a breeder to watch as puppies would die from hypothermia.

Under Section 28a.3, the lighting requirement of 50 to 80 foot candles is excessive. Actually that intensity could be harmful to the dogs since average home lighting is 12 to 20 foot candles and even commercial lighting is 15 to 30 foot candles. Also if a kennel owner had to create a diurnal light cycle for day and night lighting it would cost over \$18,500. Excessive cost for inhumane lighting would be a ridiculous proposal!

I also believe that in Section 28a.2 the requirement to ensure that particulate matter form such as dander, hair and food is below 10 milligrams per meter cubed is unrealistic. All dog breeders know that puppies love to play in their bedding which is typically wood shavings or shredded paper. It would be impossible to meet the strict requirements of less than 10 milligrams per meter cubed. This is unnecessary stress on owners.

Please consider these concerns and vote against the proposed changes to Section 28a. Kennel owners and legislators strive to make the best regulations to create the best conditions for animals, but I believe these proposed regulations are on the wrong track.

Sincerely,



Crist Lapp
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